

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Angel Torres,	)	
	)	Case No 08 C 282
Plaintiff,	)	
	)	Judge Kendall
v.	)	
	)	Magistrate Judge Denlow
City of Chicago, Officer Jerry Doscocz (#6573),	)	
Officer Kenneth Flaherty (#13584), Officer John	)	JURY TRIAL DEMANDED
Doe #1, Officer John Doe #2,	)	
	)	
Defendants.	)	

**DEFENDANT OFFICERS' UNOPPOSED MOTION TO  
EXTEND TIME TO ANSWER OR OTHERWISE PLEAD**

Defendants, Jerry Doscocz and Kenneth Flaherty (Defendant Officers) by and through one of his attorneys, Matthew R. Hader, Assistant Corporation Counsel for the City of Chicago, respectfully requests this Honorable Court to enlarge the time, up to and including March 21, 2008, in which to answer or otherwise plead to the Complaint. In support of this motion, Defendant states:

1. This matter was filed by the Plaintiff on January 11, 2008.
2. Summons and Complaint were served on Defendant Doscocz on February 2, 2008. Summons and Complaint were served on Defendant Flaherty on February 10, 2008.
3. The undersigned filed an appearance for the Defendant Officers on this day, February 22, 2008.
4. Defendant Doscocz's Answer or other responsive pleading is due on or about this day, February 22, 2008. Defendant Flaherty's Answer or other responsive pleading is due on or about March 2, 2008.
5. The undersigned has not yet been able to review materials pertinent to the allegations in order to be able to file an Answer or other responsive pleading. Nor has the undersigned been able to meet with the defendants to discuss the

Complaint or a responsive pleading.

6. The Defendant Officers request that the time to answer or file a responsive pleading to the Complaint be extended thirty days, up to and including March 21, 2008.
7. This motion is Defendant Officers' first request for an extension of time to answer or otherwise plead. Such a request is not intended to unduly delay the resolution of the disputed issues.
8. On February 22, 2008, the undersigned contacted counsel for the plaintiff seeking agreement to this motion. Plaintiff's counsel indicated that he had no opposition to this motion and that it he agreed to the request for an extension of time.

**WHEREFORE**, Defendants Daskocz and Flaherty, respectfully requests that they be given until March 21, 2008, to answer or otherwise plead to plaintiffs' Complaint.

Respectfully submitted,

s/ Matthew R. Hader  
MATTHEW R. HADER  
Assistant Corporation Counsel

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**CERTIFICATE OF SERVICE**

I, Matthew R. Hader, hereby certify that I have caused a true and correct copy of the above and foregoing **NOTICE OF UNOPPOSED MOTION** and **DEFENDANT OFFICERS' UNOPPOSED MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE PLEAD**, to be sent via e-filing to the person(s) named in the foregoing Notice, a "Filing User" pursuant to Case Management/Electronic Case Files, on February 22, 2008, in accordance with the rules on electronic filing of documents.

s/ Matthew R. Hader  
MATTHEW R. HADER  
Assistant Corporation Counsel